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JUN 25 1997

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June 25, 1997

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William F. Caton, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: CC Docket No. 97-137

Dear Mr. Caton:

On behalf of the Competitive Telecommunications Association ("CompTel"), please take notice that yesterday, we met with Thomas Boasberg, legal advisor to Chairman Hundt, to discuss CompTel's position in this docket. Representing CompTel were myself and Danny Adams from Kelley Drye & Warren LLP, Joe Gillan, and Genevieve Morelli of CompTel. The attached document was distributed and discussed at the meeting.

In accordance with Section 1.1206 of the Commission's rules, an original and one copy of this notice are provided for inclusion in the public record.

Sincerely,



Steven A. Augustino

SAA/es

Attachment

cc: Mr. Boasberg

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20054

In the Matter of

Application of Ameritech Michigan	:	
Pursuant to Section 271 of the	:	
Telecommunications Act of 1996 to	:	CC Docket No. 97-137
Provide In-region, InterLATA Services	:	
in Michigan	:	

Ex Parte Presentation
By The Competitive Telecommunications Association

June 24, 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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AMERITECH APPLICATION FAILS SECTION 271 IN A NUMBER OF RESPECTS

The principal defects in Ameritech's application include:

◆ **AMERITECH DOES NOT SATISFY THE COMPETITIVE CHECKLIST**

Ameritech unlawfully prohibits purchasers of unbundled switching from acting as the exclusive provider of exchange access services

Ameritech refuses to provide access to its common interoffice transport facilities

Ameritech does not offer fully functional OSS and refuses to commit to reasonable performance criteria for OSS

◆ **AMERITECH HAS NOT DEMONSTRATED THAT ITS AFFILIATES AIIS AND ALDIS COMPLY WITH THE STRUCTURAL SEPARATION REQUIREMENTS**

◆ **AMERITECH HAS NOT SATISFIED SECTION 271(C)(1)(A)'S ACTUAL COMPETITION TEST**

◆ **WITH LOCAL COMPETITION STILL ITS FORMATIVE STAGES, GRANT OF THE APPLICATION IS NOT IN THE PUBLIC INTEREST**

Switching

A purchaser of unbundled switching obtains the “exclusive right to provide all features, functions, and capabilities of the switch, including switching for exchange access...”

Interconnection Reconsideration Order Par.

11. Ameritech refuses to permit a ULS purchaser to bill for access unless the IXC routes the call exclusively through transport facilities dedicated to the ULS purchaser.

Transport

Ameritech refuses to provide common transport, i.e., access to the interoffice facilities used by Ameritech to route its own local exchange traffic. Ameritech offers only dedicated transport and transport shared by CLECs (but not Ameritech).

OSS

Ameritech has not shown that its OSS systems perform in commercial settings. The MPSC and Wisconsin PSC Found Ameritech's OSS to be deficient. Ameritech Has Not Agreed to Performance Criteria Applicable to its OSS.